



September 19, 2019

Attn: Elizabeth Appel  
Office of Regulatory Affairs & Collaborative Action  
U.S. Department of the Interior  
1849 C Street NW, MIB-4660-MS  
Washington, DC 20240

Re: Bureau of Indian Affairs Proposed Action to Eliminate the requirements of 25 C.F.R. § 170.443(b) Federal Register # 1076-AF45

Dear Ms. Appel:

Please consider this correspondence Chugachmiut's comments in response to the Federal Register Notice referenced above in which the United States Bureau of Indian Affairs (BIA) is proposing to eliminate the requirements of 25 C.F.R. § 170.443(b). We strongly support this proposed action. We have been provided a copy of Kawerak, Inc.'s written testimony on this issue. We are in support of the BIA's proposed action for the same reasons described in the testimony and ask that our comments be considered together with that testimony and made a part of the record.

We stand united with our partner tribes and tribal organizations across the State of Alaska in expressing concerns about the potential devastating effect implementation of 25 C.F.R. § 170.443(b) could have on transportation infrastructure development in the State. This is especially true in rural areas where proposed roads that have already been approved and are in the National Tribal Transportation Facility Inventory are vital to the continued operation and success of Tribal Transportation programs.

We also support the elimination of the arbitrary 15 mile limitation for primary access routes in 25 C.F.R. § 170.447, and revision of 25 C.F.R. § 170.443(a) requirements to be more in line with planning development rather than project development, similar to the prior 443(a) requirements.

Thank you for your consideration of this matter.

Sincerely,

Angela J. Vanderpool  
Executive Director

